comsearch
A CommScope Company

19700 Janelia Farms Blvd
Ashburn, VA 20147
703-726-5900

REDACTED – FOR PUBLIC INSPECTION

March 7, 2019

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 15-319, Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Google LLC and CommScope, Inc.

Dear Ms. Dortch:

Attached please find a cover letter and report presenting results of performance certification tests and observations performed in October 2018 on an Environmental Sensing Capability (ESC) sensor submitted by Google LLC and CommScope, Inc. of North Carolina.

Comsearch, a CommScope Company, requests confidential treatment of this report in order to protect our evolving business and technology strategies. The information we seek to keep confidential includes control, sensing, and communications information relating uniquely to its ESC capability. Because ESC services will be provided in a competitive environment, disclosure of this sensitive and proprietary information, which Comsearch has not made publicly available, could result in substantial competitive harm to Comsearch. Consistent with 47 C.F.R. § 0.459, Comsearch requests notification if release of confidential information is requested pursuant to the Freedom of Information Act or otherwise.

Please feel free to contact me if you should have any questions or if you require any additional information.

Respectfully Submitted,

/s/ H. Mark Gibson

H. Mark Gibson
Director, Regulatory Policy
CommScope
19700 Janelia Farm Boulevard
Ashburn, Virginia 20147

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Re: GN Docket No. 15-319, Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Google LLC and CommScope, Inc.

Dear Ms. Dortch:

Comsearch, a CommScope Company, submits the attached report in support of certification of their ESC for use in commercial deployment of 3.5 GHz spectrum sharing systems.

On February 28, 2019, the United States Department of Commerce, the Institute for Telecommunications Sciences (ITS), and the National Telecommunications and Information Administration issued the attached report presenting results of performance certification tests and observations performed in October 2018 on an ESC sensor submitted by Google LLC and CommScope, Inc. of North Carolina.[1] The certification work was performed by ITS pursuant to a Cooperative Research and Development Agreement (CRADA) with Google and CommScope (CN-ITS-18-0009 and CN-ITS18-0010, respectively).[2]

As described by ITS, the ESC sensor "*passed all certification tests and observations*" without "*problems or deficiencies . . . noted in any of the certification tests and observations*" performed.[3]

Please feel free to contact me if you should have any questions or if you require any additional information.

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[1] *Id*. at 4.

[2] *Id*. at 24.

[3] *See* Frank Sanders, et al., U.S. Dep't of Commerce, ITS, and Nat'l Telecomms. and Info. Admin., *Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Google LLC and CommScope, Inc*., Final Report (Feb. 28, 2019).

Respectfully Submitted,

/s/ H. Mark Gibson

H. Mark Gibson
Director, Regulatory Policy
CommScope
19700 Janelia Farm Boulevard
Ashburn, Virginia 20147

Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Google LLC and CommScope, Inc.

February 28, 2019
Final Report

Prepared by:

Frank Sanders, John Carroll, Geoffrey Sanders,
Rebecca Dorch, and Christopher Redding

[REDACTED]